

# Exhibit 6

# acupay

www.acupay.com

**New York**

30 Broad Street  
46<sup>th</sup> Floor  
New York, NY 10004  
Tel: + 1 212 422 1222  
Fax: + 1 212 422 0790

**London**

28 Throgmorton Street  
1<sup>st</sup> Floor  
London EC2N 2AN  
Tel: + 44 20 7382 0340  
Fax: + 44 20 7256 7571

**Madrid**

Pradillo, 5 Bajo Ext. dcha.  
28002 Madrid, Spain

Skattecenter Høje-Taastrup  
Postboks 60  
DK-2630 Taastrup



Dear,

Please find attached a reclaim application to obtain a full refund of Danish dividend tax for a qualifying U.S. pension fund within the meaning of the Double Taxation Convention concluded between Denmark and the United States of America.

BENEFICIAL OWNER: Michelle Investments Pension Plan

TAX IDENTIFICATION NUMBER: 45-5252601

ADDRESS: 40 West 57<sup>th</sup> Street, Floor 20,  
New York, NY 10019

United States of America

Enclosed you will find:

- 1 Claim to Relief from Danish Dividend Tax Form 06.003 ENG
- 1 Power of Attorney between the beneficial owner and Acupay
- 1 original Dividend Credit Advice
- 1 Certificate of Residence Form 6166 for the tax year 2012

In case you have further questions or need additional information, do not hesitate to contact me.

Kind regards,

Stef Lambersy

T: +44.207.382.0348

M: slambersy@acupay.com

**RICHARD  
MARKOWITZ**

**EXHIBIT 2121**

04 - 08 - 2021



## Claim to Relief from Danish Dividend Tax

☐ In my capacity as beneficial owner

☒ On behalf of the beneficial owner

Claim is made for refund of Danish dividend tax, in total DKK: 4,812,750.00

**Beneficial Owner**

Full name  
Michelle Investments Pension Plan (TIN: 45-5252601)

Full address  
40 West 57th Street, Floor 20  
New York, N.Y. 10019  
United States of America

E-mail  
reclaims@acupay.com attention to Stef Lambersy (+44.207.382.0348)

Signature  
Beneficial owner/applicant

STEF LAMBERSY, ASSOCIATE  
ACUPAY SYSTEM LLC

*If the claim is made on behalf of the beneficial owner the applicant's power of attorney shall be enclosed*

As documentation is enclosed dividend advice(s), number: 1

*(This documentation is obligatory)*

**Financial institution**

The amount is requested to be paid to:

Name and address

DEXIA BANQUE INTERNATIONALE A LUXEMBOURG S.A  
69 route d'Esch, Office PLM +446A, L 2953 Luxembourg  
name of the account holder: Acupay System LLC

Reg. no

Account no

0022 1819 0795 5500

SWIFT

BLZ

IBAN

BILLLULL

LU52 0022 1819 0795 5500

**Certification of the competent authority**

It is hereby certified that the beneficial owner is covered by the Double Taxation Convention concluded between Denmark and

Date

Official stamp and signature

When signed to be forwarded to:

Skattecenter Høje-Taastrup  
Postboks 60  
DK-2630 Taastrup



**Solo Capital**

4 Throgmorton Avenue  
London EC2N 2DL

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**DIVIDEND CREDIT ADVICE**

**Issue Date: 14<sup>th</sup> August 2012, Issue No: 0075**

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**Michelle Investments Pension Plan**

40 West 57th Street  
Floor 20  
New York, NY 10019

**Date: 14<sup>th</sup> August, 2012**

Dear Sirs,

Please be advised that we have credited your account MIC01 – Michelle Investment Pension Plan for the value date 14<sup>th</sup> August 2012. This payment represents the dividend as shown below:

<b>Security Name:</b>	TDC A/S
<b>Sedol:</b>	5698790
<b>ISIN:</b>	DK0060228559
<b>Pay Date:</b>	14 <sup>th</sup> August, 2012
<b>No of Shares:</b>	7,750,000
<b>Gross Dividend:</b>	DKK 17,825,000.00
<b>Tax:</b>	DKK 4,812,750.00
<b>Net Dividend:</b>	DKK 13,012,250.00

.....  
**Name: GRAHAM HORN**  
Solo Capital Partners LLP

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## SPECIAL POWER OF ATTORNEY

I,

**Michelle Investments Pension Plan** (TAX ID: 45-5252601),  
of 40 West 57th Street, Floor 20, New York, NY 10019, New York

hereby grant

**ACUPAY SYSTEM LLC**,  
of 28 Throgmorton Street,  
London, EC2N 2AN  
United Kingdom,

a special power of attorney, as broad as is necessary under the law, to pursue and file for reductions in rates of tax withholding in my name for which I am eligible, to oversee this process, and to collect refunds of excess withholding tax to which I am entitled on my behalf.

### AUTHORISATION

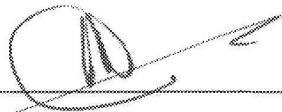
This power of attorney authorises **ACUPAY SYSTEM LLC** to carry out any and all acts which are necessary and appropriate for the following:

1. To request a refund of the excess tax withheld by submitting reclaim forms with foreign tax authorities.
2. To request a refund of the excess tax withheld by submitting claims with foreign custodians, withholding agents, or issuers.
3. To collect all repayments owed in above context from foreign tax authorities, custodians, withholding agents or issuers in the name of **MICHELLE INVESTMENTS PENSION PLAN** and to acknowledge the receipt of such amounts.
4. To present all kinds of administrative appeals and economic-administrative reclaims to the relevant authorities, tribunals, and courts.
5. Request/obtain tax residency certification in the name of **MICHELLE INVESTMENTS PENSION PLAN** as may be necessary to carry out the above.

This Power of Attorney shall take effect upon execution of the document and remain in effect until the Power of Attorney has been terminated by either party by providing five days prior written notice of its intent to terminate to the other party, whichever is earliest.

### IN WITNESS WHEREOF

Sign:




Print name:

John H. van Merkenstrijn (authorised signer)

Date:

August 3, 2012

Witness's name and signature:

  
Alicia Colodner





CERTIFICATION  
PROGRAM

DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
PHILADELPHIA, PA 19255

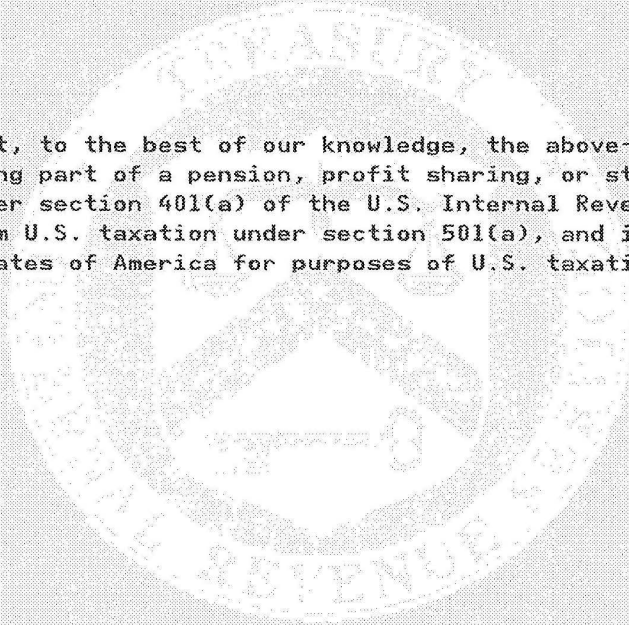
Date: July 23, 2012



000295

Taxpayer: MICHELLE INVESTMENTS PENSION PLAN  
TIN: 45-5252601  
Tax Year: 2012

I certify that, to the best of our knowledge, the above-named entity is a trust forming part of a pension, profit sharing, or stock bonus plan qualified under section 401(a) of the U.S. Internal Revenue Code, which is exempt from U.S. taxation under section 501(a), and is a resident of the United States of America for purposes of U.S. taxation.



P. J. Bazick  
Field Director, Accounts Management